

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)(KMW)
THIS DOCUMENT RELATES TO ALL CASES	

**PLAINTIFFS’S NOTICE OF FILING OF PROPOSED JURY
INSTRUCTIONS, VERDICT FORM, AND DAMAGES WORKSHEETS**

COMES NOW, MSP Recovery Claims, Series, LLC (“MSP”), individually and on behalf of TPP Breach of Express Warranty subclass b, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a (collectively, “Plaintiffs” or “TPP Classes”), by and through MDL co-lead counsel, TPP class counsel, and trial counsel, who files this Notice submitting herewith the following documents:

Exhibit A: Plaintiffs’ Proposed Jury Instructions (with authorities)

Exhibit B: Plaintiffs’ Proposed Jury Instructions (clean)

Exhibit C: Plaintiffs’ Proposed Verdict Form

Exhibit D: Plaintiffs’ Proposed Compensatory Damages Worksheets

Exhibit E: Plaintiffs' Proposed Punitive Damages Worksheets

Dated: March 14, 2024

Respectfully submitted,

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<p>Andres Rivero Jorge Mestre Zalman Kass Rivero Mestre LLP 2525 Ponce de Leon Blvd., Suite 1000 Miami, FL 33134 Phone (305) 445-2500 jmestre@riveromestre.com</p>	<p>Gregory P. Hansel John J. Cronan, III Elizabeth F. Quinby Preti, Flaherty, Beliveau & Pachios, Chartered, LLP One City Center P.O. Box 9546 Portland, ME 04112 Phone: (207) 791-3000 ghansel@preti.com</p>

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MDL Co-lead Counsel, TPP Class Counsel, and Trial Counsel

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2024, a true and correct redacted copy of the foregoing was filed and served via the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Christopher Geddis

Christopher Geddis